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June 16, 2025

United States District Court  
Southern District of New York  
40 Foley Square, Room 435  
New York, N.Y. 10007  
ALCarterNYSDChambers@nysd.uscourts.gov

Attn.: Honorable Justice Carter

Re: The Pan-Albanian Federation of America VATRA (THE HEARTH) Inc. v.  
Mirakaj & Lumaj  
Docket #: 24-CV-01610 (ALC) (SDA)

Dear Honorable Justice Carter:

My firm represents the plaintiff, The Pan-Albanian Federation of America VATRA (THE HEARTH) Inc., on this matter. On February 27, 2025, Your Honor ordered a 60-day stay of the case so that the parties could engaged in settlement efforts with the assistance of Honorable Justice Stewart Aaron. (ECF 72.)

The parties have exchanged terms. But significant work remains to be done. That said, counsel for all parties believe a further stay will be useful and hopefully productive.

I have conferred with all counsel and we all respectfully request your Honor stay this matter for 60 more days, or such other amount His Honor permits, while we continue to work out the details of this potential settlement.

This is the second request for a stay on this matter while the parties continue their efforts to find the proper language and parameters for this possible settlement. The first request was made on February 26, 2025. (ECF 70.)

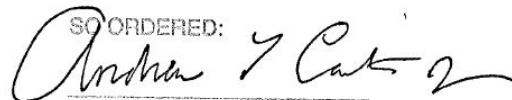
We respectfully thank the Court for consideration of this request.

Very truly yours,  
/s/ Darius Pakrooh  
Darius Pakrooh, Esq.

cc:

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SO ORDERED:  
  
HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE

New York, NY  
June 17, 2025